

1 Marquiz Law Office  
2 Professional Corporation

3 3088 Via Flaminia Court  
4 Henderson, NV 89052  
5 Phone: (702) 263-5533  
6 Fax: (702) 263-5532  
7 Craig A. Marquiz, Esq.  
8 NV Bar #7437  
9 [MarquizLaw@cox.net](mailto:MarquizLaw@cox.net)

10 Attorney for Plaintiffs

11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 JOSEPH O'SHAUGHNESSY, et al.

14 Plaintiffs,

15 v.

16 UNITED STATES OF AMERICA,

17 Defendants.

Case No.: 2:22-cv-01039-WQH-EJY

18 TODD C. ENGEL,

19 Plaintiff,

20 v.

21 UNITED STATES OF AMERICA,

22 Defendants.

Case No.: 2:22-cv-01040-WQH-EJY

**SUPPLEMENTAL STATUS REPORT**

23 Plaintiffs Joseph O'Shaughnessy, Jason D. Woods, Mel Bundy and Dave Bundy  
24 (hereinafter the "Tier 2 Plaintiffs") and the Bundy Family Members (i.e., Marylynn Bundy,  
25 Briana Bundy, Brett Roy Bundy, Maysa Lynn Bundy, Dally Anne Bundy, Bronco Cliven Bundy,  
26 Payton Alma Bundy, Piper Bodel Bundy, Montana Bundy, Bentile Bundy, Presly Bundy, Kymber  
27 Bundy and Adahlen Bundy) hereinafter collectively "the O'Shaughnessy Plaintiffs," Todd Engel  
28 ("Engel" - the Related Action Plaintiff) and the United States of America ("USA"), by and  
through their respective counsel of record hereby update the Court in furtherance of their Joint

Status Reports filed on November 30, 2023 (i.e., ECF No. 52 in *O'Shaughnessy*; ECF No. 44 in *Engel*) and, in accordance with the Court's January 17, 2023 Minute Orders (i.e., ECF No. 30 in *O'Shaughnessy*; ECF No. 23), the parties have been conferring, in good faith, regarding: (1) the appropriateness of an Order consolidating both matters pursuant to Fed.R.Civ.P. 42; (2) the entry of a Protective Order to govern discovery in the companion cases; (3) the need for an extended discovery schedule to be completed in phases due to the large quantity of documents to review before some discovery decisions can be made. The parties ask the Court's permission to submit their discovery plan and proposed scheduling order on or before February 1, 2024.

RESPECTFULLY SUBMITTED this 16<sup>th</sup> day of January, 2024.

Marquiz Law Office  
Professional Corporation

MERRICK GARLAND  
United States Attorney General

By: /s/ Craig A. Marquiz, Esq.  
Craig A. Marquiz, Esq.  
3088 Via Flaminia Court  
Henderson, NV 89052  
Counsel for Plaintiffs

By: /s/ Brock Heathcotte, Esq.  
Brock Heathcotte, Esq.  
Neil Singh, Esq.  
Special Assistant US Attorneys,  
Acting Under Authority Conferred by  
28 U.S.C. § 515  
Counsel for Defendant United States

### **ORDER**

Pursuant to Stipulation and good cause appearing,  
IT IS ORDERED that the parties shall have through February 1, 2024 to submit their  
Discovery Plan & Scheduling Order.

Dated this \_\_\_\_ day of January, 2024.

\_\_\_\_\_  
United States District Court Judge